# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE WINCHESTER DIVISION

ASHTON HUGHES,	)
JOSHUA VANDUSEN,	)
SHANNON HELMERS, and	)
CHARLES DODSON,	) Case No. 4:19-cv-00028-CLC-SKL
Plaintiffs,	) JURY DEMAND
v.	) Judge Collier
DENISE JACKSON and	) Magistrate Judge Lee
RVSHARE, LLC,	)
Defendants.	) ) )
DENISE JACKSON,	) )
Counter-Plaintiff,	)
v.	)
A GEOMONI TENEGRAPIS	)
ASHTON HUGHES,	)
Counter-Defendant.	, )

### **PLAINTIFFS' WITNESS LIST**

Plaintiffs, Ashton Hughes, Joshua VanDusen, Shannon Helmers, and Charles Dodson, hereby submit the following Witness List in accordance with the Scheduling Order and Fed. R. Civ. P. 26(a)(3)(A)(i). Plaintiffs reserve the right to update or amend this as is necessary as discovery progresses and as additional information becomes available. Plaintiffs also reserve the right to rely upon the testimony of any witnesses listed or disclosed by Defendants as rebuttal witnesses and further reserve the right to add rebuttal witnesses as such witnesses become necessary. Unless otherwise provided below, the following witnesses' addresses and telephone numbers have been provided to the extent known to Plaintiffs.

## Plaintiffs expect to call the following witnesses:

- 1. Plaintiff Ashton (Hughes) Howard
- 2. Plaintiff Joshua VanDusen
- 3. Plaintiff Shannon Helmers
- 4. Plaintiff Charles Dodson
- 5. Defendant Denise Jackson
- 6. Rule 30(b)(6) corporate representative of Defendant RVshare, LLC
- 7. Mark Spears
- 8. Brandon Gunn
- 9. Zach Grosch
- 10. Brandon Reed
- 11. Gary Fischer
- 12. Robert Enckhausen
- 13. Samantha Rockey
- 14. Drew Hooker
- 15. Tony Finnell
- 16. Nita Jernigan
- 17. Anissa Duckett
- 18. Candy Grisham
- 19. Sydney Cole
- 20. April VanDusen
- 21. Sam VanDusen
- 22. Laura Helmers

- 23. Phillip Vaughan
- 24. Elizabeth Bungert
- 25. Quinn Hill
- 26. Holly Carson
- 27. Kristopher Dodson 423-322-2974
- 28. Nicole Bernatowicz, DO
- 29. Wade Lenz, MD
- 30. Jean Cobb, PhD
- 31. Carnelius J. Mance, MD
- 32. Thomas Boduch, MD
- 33. Kirk J. Kleinfeld, MD
- 34. Emily Sitomer, FNP-C
- 35. Shannon Smith, LPC
- 36. Emily Kate Brumfield, MD
- 37. William Gregorie, MD

Plaintiffs intend to call the following witnesses if the need arises:

- 38. Keith James
- 39. Tyler Bradshaw
- 40. Doug Richardson
- 41. Rebekah McCarver
- 42. Caleb Tuell
- 43. Carole Dempsay

- 44. Matt Payne
- 45. John Fisher
- 46. Mike Diienno
- 47. Bryan Grisham
- 48. Jeannie Cantrell
- 49. Pete VanDusen
- 50. Stan Clark
- 51. Brian Jennings
- 52. Jeremiah Partin
- 53. Cathy Rhinehart
- 54. Ginger Pickens
- 55. Tim Sutter
- 56. Sarah Johnson, MD
- 57. Jennifer Dooley, MD
- 58. Brittany R. McKenzie, MD
- 59. Ryan Goldstein, MD
- 60. Michael G. Davis, MD
- 61. Christine Jeong, MD
- 62. Harry Severance, MD
- 63. Ashley Smith, MD
- 64. Jacob Cantrell, MD
- 65. Catherine Mabee, PT, DPT
- 66. Travis M. Kerr, MD

- 67. Kristen Allen, DNP, FNP-BC
  Cool Springs Internal Medicine & Pediatrics, PLLC
  1607 Westgate Circle, Suite 200
  Brentwood, TN 37027
  615-376-8195
- 68. Kavita Karlekar, MD
- 69. Mark Stacey and/or Angelique Stacey
- 70. Justin Townley
- 71. William Keogh and/or Meggie Anne Keogh
- 72. Representative of Air Evac Lifeteam 1001 Boardwalk Springs Place, Suite 250 O'Fallon, Missouri 63368 636-695-5400
- 73. Representative of Med-Trans Air Medical Transportation 2200 Westcourt Rd
  Denton, TX 76207
  940-591-5800
- 74. Representative of Vanderbilt LifeFlight 1211 Medical Center Dr Nashville, TN 37232 615-322-5000
- 75. Representative of Erlanger Baroness Hospital 975 E 3rd St Chattanooga, TN 37403 423-778-7000
- Representative of Vanderbilt University Medical Center
   1211 Medical Center Dr
   Nashville, TN 37232
   615-322-5000
- 77. Representative of Unity Medical Center481 Interstate DrManchester, TN 37355931-728-6354

- 78. Representative of Coffee County EMS 1110 Madison St Manchester, TN 37355 931-723-2648
- 79. Witnesses listed in Plaintiffs' initial disclosures, expert disclosures, and discovery responses, including medical records
- 80. Witnesses listed in Defendant Denise Jackson's initial disclosures, expert disclosures, discovery responses, and witness list
- 81. Witnesses listed in Defendant RVshare, LLC's initial disclosures, expert disclosures, discovery responses, and witness list
- 82. Any impeachment or rebuttal witnesses as deemed necessary at trial

Dated: December 14, 2020. Respectfully submitted,

#### **NEAL & HARWELL, PLC**

By: /s/ Benjamin C. Aaron
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Counsel for Plaintiffs

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served by the Court's Electronic Filing System upon the following counsel of record on this 14th day of December, 2020.

Gerard M. Siciliano, Esq. Angela Cirina Kopet, Esq. Alan C. Blount, Esq. G. Graham Thompson, Esq.

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Counsel for Defendant Denise Jackson Counsel for Defendant RVShare, LLC

Herbert H. Slatery III Office of the Attorney General & Reporter P.O. Box 20207 Nashville, TN 37202-0207 (Will be served via U.S. Mail only)

/s/ Benjamin C. Aaron